

April 11, 2024

The Honorable Chief Judge Laura Taylor Swain
 United States District Court Southern District of New York
 500 Pearl Street
 New York New York, 10017 -1312
 Civil Action No. 18-cv-0993 Trombetta vs. Novocin and WorthPoint Corporation

Re: Plaintiff's response to All Attorneys Regarding Mr. Duff's emails

To The Honorable Judge Laura Taylor Swain :

Today, I received two email from Attorney Adam Bialek he sent last night on April 11, 2024. I responded to the issue on Mr. Duff sending me Doc. 548. I reviewed my INBOX and SENT folders. I note to Your Honor this email account was set to SEND and RECEIVE emails from the Defendants, specifically for this case.

Attached is today's email response to all the attorneys regarding Mr. Duff and my email account. The last email I have documented from Mr. Duff is July 25, 2023. I then went to print out a copy of my SENT emails and then saw listed JUNK MAIL. Please note my email account only lists the INBOX - SENT and DRAFT Items.

My print out my sent emails, is the FIRST time I saw the JUNK Emails (4). Mr. Duff's documents were sent to my Junk.—again it is NOT listed on my email account. Shortly, thereafter, today Mr. Duff responded to my email. It was listed in my INBOX. My Duff suggested I look it the JUNK folder which I serendipitously found right before his suggestion.

Plaintiff sent another email to Mr. Duff on April 6, 2024. A simple email phone call before this occurred would have sufficed and solved the problem faster. I have responded to Mr. Duff email and issued a direct apology.

In good faith, I issue a formal apology to the Court.

I end by bringing to the Court's attention my claim for emotional distress and right now it is very real. Once again, I had nothing to do with these two companies, the painting and had to repeat this over and over this for close to nine years. Any person would be adversely affected by such repetition. I am pleased this problem was solved and hope this case will be resolved as well.

Pro Se Plaintiff
 Annamarie Trombetta
 175 East 96th Street (12 R)
 New York, New York 10128

Respectfully Submitted,

——— Electronic Signature ———

/s/ Annamarie Trombetta April 11, 2024

Annamarie Trombetta

Microsoft Outlook (formerly Hotmail): Free email... Mail - Annamarie Trombetta - Outlook Mail - Annamarie Trombetta - Outlook Mail - Annamarie Trombetta - Outlook

Outlook Search

Home View Help **Message** Insert Format text Draw Options

Aptos 12 B I U S [Color] [Font] [List] [Align] [Link] [Image] [More]

Favorites

- Inbox 21
- Sent Items
- Drafts 63
- Add favorite

Folders

Groups

Focused Other

[Draft] Bialek, Adam
Plaintiff's Response to EAI... Wed 7:21 PM
Dear Ms. Trombetta: Thanks for sending ...
Plaintiff's Reply to... +6

This month

Bialek, Adam
Activity in Case 1:18-... (2) Mon 12:03 PM
P.S. Please also note that despite the fact ...
Doc 548 - EAI De...

Cahill, John
Plaintiff's request for Doc. 544 Tue 4/2
Please find attached Doc. 547, filed by W...
Doc 547.pdf +1

March

Bialek, Adam; Farmer, Jana S.
Plaintiff's March 26, 202... (2) Wed 3/27
I am sorry I missed your message, but it i...
March 26, 2024 L... +1

Plaintiff's Response to EAI Memorandum of Law

Send To: Bialek, Adam; +3 others

Dear Mr. Bialek,

To clear up any matters regarding Mr. Duff, I have attached screen shots from my outlook email address while I am writing this reply.

You can see John Cahill 's April 2, 2024 email with Doc. 547.

Above is your sent email with Doc. 548 and your April 10, 2024 email Wed. 7:21 that I am responding to at present. Above is another email.

The first one

Draft saved at 10:10 AM

BA Bialek, Adam
To: You, and@andamieduff.com Wed 4/10/2024 7:21 PM

Plaintiff's Response to E... Plaintiff's Response...

arie [Taskbar icons: Safari, Mail, Calendar, Photos, Music, App Store, etc.]

SENT

Microsoft Outlook (formerly Hotmail): Free email... Mail - Annamarie Trombetta - Outlook

Outlook Search Meet Now

Home View Help

New mail Empty folder Archive Report Sweep Move to Mark all as read

Favorites

- Inbox 21
- Sent Items**
- Drafts 63
- Add favorite
- Folders
- Groups

Sent Items ★

Yesterday

- [Draft] ajd@andersonjduff.com
Plaintiff's Response to EAI... Wed 6:48 PM
To All Attorneys, Attached is Plaintiff's Re...
Plaintiff's Reply to... +6
- adam.bialek@wilsonelser.com
Plaintiff's Response to Wo... Wed 5:39 PM
To All Attorneys, Attached is Plaintiff's Re...
Plaintiff's Reply to... +2

This month

- ajd@andersonjduff.com; A...
Plaintiff request for a Copy of D... Sat 4/6
To Mr. Duff, On April 4, 2024 I filed a lette...
March 26, 2024 L... +1

March

- adam.bialek@wilsonelser.com; ...
Plaintiff's March 26, 2024 Lett... Wed 3/27
To All Parties, Please see attached letter a...
March 26, 2024 L... +1

Handwritten: No Junk Email Listed

Handwritten: Sent Folder

QR code for Outlook mobile app

You're going places. Take Outlook with you for free.
Scan the QR code with your phone camera to download Outlook mobile

Select an item to read Plaintiff's Response...

Taskbar: arie, various application icons, clock showing 11:11



Type here to search

Entire Mailbox



Privacy



Options



Sign out



Mail



Calendar



Contacts



Deleted Items



Drafts [62]



Inbox (21)



Junk Email [4]



Sent Items

[Click to view all folders](#)

Manage Folders...



Reply



Reply All



Forward



Delete



Junk



Close



Print



Share



Move



Copy

Re: Plaintiff's Response to EAI Memorandum of Law

Annamarie Trombetta [annamarietrombettalegal@outlook.com]

To help protect your privacy, some content in this message has been blocked. If you're sure this message is from a trusted sender and you want to re-enable the blocked features, [click here](#).

Sent: Thursday, April 11, 2024 10:51 AM**To:** Bialek, Adam [adam.bialek@wilsonelser.com]; ajd@andersonjduff.com**Cc:** Farmer, Jana S. [Jana.Farmer@wilsonelser.com]; Cahill, John [John.Cahill@wilsonelser.com]**Attachments:** April 10, 2024 Email with~1.png (445 KB); Anderson Duff Last email J~1.png (473 KB); April 6, 2024 Sent Email t~1.png (452 KB)

To all Parties,

To clear up matter with Mr. Duff I have attached three screen shots.

Please review the attachments and respond to this email

Sincerely,

Annamarie Trombetta

From: Annamarie Trombetta <annamarietrombettalegal@outlook.com>**Sent:** Thursday, April 11, 2024 10:32 AM**To:** Bialek, Adam <adam.bialek@wilsonelser.com>; ajd@andersonjduff.com <ajd@andersonjduff.com>**Cc:** Farmer, Jana S. <Jana.Farmer@wilsonelser.com>; Cahill, John <John.Cahill@wilsonelser.com>**Subject:** Re: Plaintiff's Response to EAI Memorandum of Law

Dear Mr. Bialek,

To clear up any matters regarding Mr. Duff, I have

attached screen shots from my outlook email address while I am writing this reply.

You can see John Cahill's April 2, 2024 email with Doc. 547.

Above is your sent email with Doc. 548 and your April 10, 2024 email Wed. 7:21 that I am responding to at present.

Above is another email

The first one in March is dated March 27, 2024.

Outlook

Type here to search Entire Mailbox

Privacy Options ? Sign out













Mail Calendar Contacts

Deleted Items Drafts [62] Inbox (21) **Junk Email [4]** Sent Items

Click to view all folders

Manage Folders...

Not Junk Move Delete Empty Junk E-Mail

	From	Subject	Received	Size
  	Anderson Duff	Re: Activity in Case 1:18-cv-009...	4/11/2024 5:59 AM	551 KB
  	Anderson Duff	Re: Plaintiff request for a Copy...	4/8/2024 4:31 PM	609 KB
  	Anderson Duff	FW: Plaintiff's request for Doc....	4/4/2024 7:07 PM	250 KB
  	Anderson Duff	Re: Plaintiff's request for Doc....	4/2/2024 10:51 PM	247 KB

- Favorites
- Inbox 21
 - Sent Items
 - Drafts 62
 - Add favorite
- Folders
- Groups

- Focused Other
- ajd@andersonjduff.com; B...
Plaintiff's Response to EAI Me... 11:48 AM
Ms. Trombetta: Please search your email i...
Plaintiff's Reply to... +10
- EmailDeliverySystem@wilsonel...
Plaintiff's Response to Worth... 10:29 AM
Delivery has failed to these recipients or ...
Plaintiff's Reply to... +2
- Yesterday
- Bialek, Adam
Activity in Case 1:18-cv-0... Wed 7:43 PM
FOR SETTLEMENT PURPOSES ONLY NOT ...
- This month
- Bialek, Adam
Activity in Case 1:18-... (2) Mon 12:03 PM
P.S. Please also note that despite the fact ...
Doc 548 - EAI De...
- Cabill, John

Plaintiff's Response to EAI Memorandum of Law

ajd@andersonjduff.com
To: You
Cc: Farmer, Jana S.; +2 others
Thu 4/11/2024 11:48 AM

Ms. Trombetta:

Please search your email inbox for emails from ajd@hoganduff.com, which is the email address I use professionally and the only email address included on my filings with the court. You may also wish to check your "junk" folder for emails from me.

-Anderson-

Annamarie Trombetta
To all Parties, To clear up matter w...
Thu 4/11/2024 10:51 AM

Annamarie Trombetta
Dear Mr. Bialek, To clear up any m...
Thu 4/11/2024 10:32 AM

INTERMITTENT FASTING FOR SENIORS

AGE: 65+ 16:8

AGE: 60-65 12:12

AGE: 55-60 18:6

AGE: 50-55 14:10

EXHIBIT #1

EAI000058

April

Wednesday, April 27, 2022 at 21:30:09 Eastern Daylight Time

Subject: Fwd: Your eBay item sold! 1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta yqz (330833102936)

Date: Tuesday, January 10, 2017 at 5:28:43 PM Eastern Standard Time

From: eBay EAI

To: Norb Novocin, marie novocin

----- Forwarded message -----

From: eBay <eBay@ebay.com>

Date: Sat, Dec 1, 2012 at 9:54 PM

Subject: Your eBay item sold! 1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta yqz (330833102936)

To: eBay@novocin.com

MISSING LOGO - No Color EBAY Logo

eBay

eBay sent this message to Norb & Marie Novocin (estateauctionsinc).
Your registered name is included to show this message originated from eBay. [Learn more.](#)

Congratulations, your item sold!

Dear estateauctionsinc,

You did it! Your item sold. Please ship this item to the buyer after your buyer pays. As soon as your buyer pays, print

Complete one of the following:

- **Print a shipping label** Avoid a trip to the post office, print and pay for your label at home. Printing shipping labels on eBay automatically reduces your shipping costs, and when you print shipping labels on eBay, your tracking is automatically added.
- **Provide shipping and tracking information.** When you upload tracking information to eBay, we'll send it to you so the item is on its way. This will save you time, and may result in fewer questions from buyers and higher detailed seller ratings.
- **Mark your item as shipped in My eBay.** Do this, and we'll let your buyer know the item is on its way. This will result in fewer questions from buyers and higher detailed seller ratings.

You should always leave feedback for your buyer to encourage them to buy from you again.

1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta yqz

1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta yqz

Sale price: \$181.11

Quantity sold: 1

Sale date: Dec-01

Buyer: nina c

9nack

[\[contact\]](#)

Buyer's shipping address: nina c

14215

reno, NV

[Sell another item](#) | [Send invoice](#)

Select your email preferences

- Want to reduce your inbox email volume? [Receive this email as a daily digest.](#) For other email digest options, go to [Notification Preferences](#) in My eBay.
- Don't want to receive this email? [Unsubscribe from this email.](#)

EXHIBIT #3A

From: eBay <eBay@eBay.com>
Date: Sat, Dec 1, 2012 at 9:54 PM
Subject: Your eBay item sold! 1972 Original Oil Painting Man With Red Umbrella Signed Annamaria Trombetta y12 (330833102936)
To: <eBay@novocin.com>



eBay sent this message to Norb & Marie Novocin (estateauctionsinc).
Your registered name is included to show this message originated from eBay. [Learn more](#)

Congratulations, your item sold!

Dear estateauctionsinc,

You did it! Your item sold. Please ship this item to the buyer after your buyer pays. As soon as your buyer pays, print your eBay shipping label.

Complete one of the following:

- [Print a shipping label](#) Avoid a trip to the post office, print and pay for your label at home. Printing shipping labels on eBay also offers you reduced pricing on some shipping services, and when you print shipping labels on eBay, your tracking information is uploaded automatically.
- [Provide shipping and tracking information](#) When you upload tracking information to eBay, we'll send it to your buyer and let them know the item is on its way. This will save you time, and may result in fewer questions from buyers and higher detailed seller ratings.
- [Mark your item as shipped in My eBay](#) Do this, and we'll let your buyer know the item is on its way. This will save you time, and may result in fewer questions from buyers and higher detailed seller ratings.

You should always [leave feedback](#) for your buyer to encourage them to buy from you again.

[1972 Original Oil Painting Man With Red Umbrella Signed Annamaria Trombetta y12](#)

Sale price: \$181.50
Quantity sold: 1
Sale date: Dec-01-12 18:54:01 PST
Buyer: nina correia
9naclock (ninascorreia@aol.com)
[\[contact buyer\]](#)

Buyer's shipping address: nina correia
14215 prairie flower ct
reno, NV 89511-6710 United States

[Sell another item](#) | [Send invoice to buyer](#)

Select your email preferences

- Want to reduce your inbox email volume? [Receive this email as a daily digest](#). For other email digest options, go to [Notification Preferences in My eBay](#).
- Don't want to receive this email? [Unsubscribe from this email](#).

Email reference id: [\[#45d0df16f2ea40759d3656f834970b06#\]](#)

Please don't remove this number. eBay customer support may ask you for this number, if you should need assistance.

[Learn more](#) to protect yourself from spoof (fake) emails

eBay sent this email to you at [eBay@novocin.com](#) about your account registered on [www.ebay.com](#)

eBay sends these emails based on the preferences you set for your account. To unsubscribe from this email, change your [communication preferences](#). Please note that it may take up to 10 days to process your request. Visit our [Privacy Policy](#) and [User Agreement](#) if you have any questions.

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①
Yellow
BAR

Missing

EBAY Logo is on EAI000060 and NOT on

EAI000058

Provide shipping
information

[Go to My eBay](#)

②
Title Missing
Different from
EAI000058

EAI000073

EXHIBIT # 52

Date: Tue, 10 Jan 2017 18:28:43 -0400
Subject: Fwd: Your eBay item sold! 1972 Original Oil Painting Man With
Umbrella Signed Annamarie Trombetta yqz (330833102936)
From: eBay EAI <ebay@novocin.com>
To: Norb Novocin <norb@novocin.com>,
marie novocin <mombaree@gmail.com>
Message-ID: <CALKoPL433C9xXwJ0WZpXwn-4UZVXa=hvafEWq3oDxQKfNrR2ug@mail
Thread-Topic: Your eBay item sold! 1972 Original Oil Painting Man With
Umbrella Signed Annamarie Trombetta yqz (330833102936)
Thread-Index: AU1pMjQwkqX6qfiN3bMXxD06g9CD6GdEPVhD
Mime-version: 1.0
Content-type: multipart/alternative;
boundary="B_3739174330_4019078869"

> This message is in MIME format. Since your mail reader does not understand
this format, some or all of this message may not be legible.

--B_3739174330_4019078869
Content-type: text/plain;
charset="UTF-8"
Content-transfer-encoding: quoted-printable

----- Forwarded message -----

From: eBay <ebay@ebay.com>
Date: Sat, Dec 1, 2012 at 9:54 PM
Subject: Your eBay item sold! 1972 Original Oil Painting Man With Red
Umbrella Signed Annamarie Trombetta yqz (330833102936)
To: ebay@novocin.com

eBay sent this message to Norb & Marie Novocin (estateauctionsinc).
Your registered name is included to show this message originated from
Learn more.

Congratulations, your item sold!

Dear estateauctionsinc,

You did it! Your item sold. Please ship this item to the buyer after
the buyer pays. As soon as your buyer pays, print your eBay shipping label
Complete one of the following:

Print a shipping label Avoid a trip to the post office, print and pay for
our label at home. Printing shipping labels on eBay also offers you
pricing on some shipping services, and when you print shipping labels
y, your tracking information is uploaded automatically.

Provide shipping and tracking information. When you upload tracking in
formation to eBay, we'll send it to your buyer and let them know the item
its way. This will save you time, and may result in fewer questions from

Cut
off

Cut
off

Cut
off

Cut
off

EAI000074

#8
EXHIBIT #52

rs and higher detailed seller ratings.
Mark your item as shipped in My eBay. Do this, and we'll let your buyer know the item is on its way. This will save you time, and may result in fewer questions from buyers and higher detailed seller ratings.
You should always leave feedback for your buyer to encourage them to buy from you again.

1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Tro
yqz

Sale price:\$181.50

Quantity sold:1

Sale date:Dec-01-12 18:54:01 PST

Buyer:nina correia

9naclock (ninascorreia@aol.com) [contact buyer]

Buyer's shipping address:

nina correia

14215 prairie flower ct

reno, NV 89511-6710 United States

Sell another Item | Send invoice to buyer

Provide shipping information

Select your email preferences

Want to reduce your inbox email volume? Receive this email as a daily digest.

For other email digest options, go to Notification Preferences in My eBay.

Don't want to receive this email? Unsubscribe from this email.

Email reference id: [#45d0df16f2ea40759d3656f834970b06#]

Please don't remove this number. eBay customer support may ask you for this number, if you should need assistance.

Learn More to protect yourself from spoof (fake) emails.

eBay sent this email to you at ebay@novocin.com about your account reactivated on www.ebay.com.

eBay sends these emails based on the preferences you set for your account. To unsubscribe from this email, change your communication preferences. Please note that it may take up to 10 days to process your request. Visit our Privacy Policy and User Agreement if you have any questions.

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cut
off

EAI000075

EXHIBIT # 8

--B_3739174330_4019078869
 Content-type: text/html;
 charset="UTF-8"
 Content-transfer-encoding: quoted-printable

```
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e -----<br>From: <b class=3D"gmail_sendername">eBay</b> <span di
lt;<a href=3D"mailto:ebay@ebay.com">ebay@ebay.com</a>&gt;</span><br>D
Dec 1, 2012 at 9:54 PM<br>Subject: Your eBay item sold! 1972 Origina
ainting Man With Red Umbrella Signed Annamarie Trombetta yqz (3308331
br>To: <a href=3D"mailto:ebay@novocin.com">ebay@novocin.com</a><br><b
v><div id=3D"m_3729392004584666707Header"><div><table border=3D"0" ce
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:break-word"><table cellpadding=3D"2" cellspacing=3D"3" border=3D"0"
<tbody><tr><td width=3D"1%" nowrap=3D""><img src=3D"http://q.ebaystat
s/logos/ebay_95x39.gif" height=3D"39" width=3D"95" alt=3D"eBay"></td>
ft" valign=3D"bottom"><span style=3D"font-weight:bold;font-size:xx-sm
mily:verdana,sans-serif;color:#666"><b>eBay sent this message to Norb
Marie Novocin (estateauctionsinc).</b><br></span><span style=3D"font-
mall;font-family:verdana,sans-serif;color:#666">Your registered name
uded to show this message originated from eBay. <a href=3D"http://pag
om/help/confidence/name-userid-emails.html" target=3D"_blank">Learn m
/span></td></tr></tbody></table></td></tr></tbody></table></div></div>
d=3D"m_3729392004584666707Title"><div><table style=3D"background-colo
border=3D"0" cellpadding=3D"0" cellspacing=3D"0" width=3D"100%"><tbo
=3D"8" valign=3D"top"><img src=3D"http://q.ebaystatic.com/aw/pics/glo
urve.gif" height=3D"8" width=3D"8"></td><td valign=3D"bottom" width=3
tyle=3D"font-weight:bold;font-size:14pt;font-family:arial,sans-serif;
0;margin:2px 0 2px 0">Congratulations, your item sold!</span></td><td
"8" valign=3D"top" align=3D"right"><img src=3D"http://p.ebaystatic.co
balAssets/rtCurve.gif" height=3D"8" width=3D"8"></td></tr><tr><td sty
und-color:#fc0" colspan=3D"3" height=3D"4"></td></tr></tbody></table>
><div id=3D"m_3729392004584666707SingleItemCTA"><div><table border=3D
ding=3D"2" cellpadding=3D"3" width=3D"100%"><tbody><tr><td><font styl
10pt;font-family:arial,sans-serif;color:#000">Dear estateauctionsinc,
border=3D"0" cellpadding=3D"0" cellspacing=3D"0" width=3D"100%"><tbo
src=3D"http://q.ebaystatic.com/aw/pics/s.gif" height=3D"10" alt=3D"
tbody></table>You did it! Your item sold. Please ship this item to th
after your buyer pays. As soon as your buyer pays, print your eBay s
label.<table border=3D"0" cellpadding=3D"0" cellspacing=3D"0" width=
><tr><td><img src=3D"http://q.ebaystatic.com/aw/pics/s.gif" height=3D
"></td></tr></tbody></table><div>Complete one of the following:<br><u
=3D"list-style-type:disc;margin:10px 10 10 14px"><li><a href=3D"http:
y.com/rover/0/e12011.m354.l1337/7?euid=3D45d0df16f2ea40759d3656f83497
```


EAI000076

8
 EXHIBIT # 52

loc=3Dhttp%3A%2F%2Fpayments.ebay.com%2Fws%2FeBayISAPI.dll%3FPrintPost
 nsactionid%3D0%26itemid%3D330833102936%26ssPageName%3DADME%3AL%3AE0IS
 %3A1337" target=3D"_blank">Print a shipping label Avoid a trip to
 office, print and pay for your label at home. Printing shipping labe
 Bay also offers you reduced pricing on some shipping services, and wh
 print shipping labels on eBay, your tracking information is uploaded
 ically.<a href=3D"http://rover.ebay.com/rover/0/e12011.m354.
 uid=3D45d0df16f2ea40759d3656f834970b06&loc=3Dhttp%3A%2F%2Fpayment
 2Fws%2FeBayISAPI.dll%3FAddTrackingNumber2%26flow%3Dmyebay%26LineID%3D
 02936_0%26ssPageName%3DADME%3AL%3AE0ISSA%3AUS%3A1663" target=3D"_blan
 e shipping and tracking information. When you upload tracking inf
 n to eBay, we'll send it to your buyer and let them know the item is
 way. This will save you time, and may result in fewer questions from
 and higher detailed seller ratings.<a href=3D"http://rover.e
 over/0/e12011.m354.l1662/7?euid=3D45d0df16f2ea40759d3656f834970b06&am
 p%3A%2F%2Fmy.ebay.com%2Fws%2FeBayISAPI.dll%3FMyEbayBeta%26CurrentPage
 ayNextSold%26ssPageName%3DADME%3AL%3AE0ISSA%3AUS%3A1662" target=3D"_b
 k your item as shipped in My eBay. Do this, and we'll let your bu
 w the item is on its way. This will save you time, and may result in
 uestions from buyers and higher detailed seller ratings.You
 always <a href=3D"http://rover.ebay.com/rover/0/e12011.m354.l1332/7?
 df16f2ea40759d3656f834970b06&loc=3Dhttp%3A%2F%2Ffeedback.ebay.com%
 BayISAPI.dll%3FLeaveFeedback2%26show_as%3Dsold%26ssPageName%3DADME%3A
 SSA%3AUS%3A1332" target=3D"_blank">leave feedback for your buyer
 age them to buy from you again.

</div><div><table width
 cellpadding=3D"0" cellspacing=3D"3" border=3D"0"><tbody><tr><td vali
 n=3D"center" width=3D"100" nowrap=3D""><a href=3D"http://rover.ebay.c
 11.m43.l1123/7?euid=3D45d0df16f2ea40759d3656f834970b06&loc=3Dhttp
 i.ebay.com%2Fws%2FeBayISAPI.dll%3FViewItem%26item%3D330833102936%26ss
 e%3DADME%3AL%3AE0ISSA%3AUS%3A1123" target=3D"_blank"><img src=3D"http
 baystatic.com/pict/330833102936.jpg" alt=3D"1972 Original Oil Paintin
 h Red Umbrella Signed Annamarie Trombetta yqz" border=3D"0"></td>
 an=3D"2" valign=3D"top"><table width=3D"100%" cellpadding=3D"0" cells
 er=3D"0"><tbody><tr><td style=3D"font-size:10pt;font-family:arial,san
 or:#000" colspan=3D"2"><a href=3D"http://rover.ebay.com/rover/0/e1201
 /7?euid=3D45d0df16f2ea40759d3656f834970b06&loc=3Dhttp%3A%2F%2Fcgi
 Fws%2FeBayISAPI.dll%3FViewItem%26item%3D330833102936%26ssPageName%3DA
 %3AE0ISSA%3AUS%3A1123" target=3D"_blank">1972 Original Oil Painting M
 ed Umbrella Signed Annamarie Trombetta yqz</td></tr><tr><td style
 size:10pt;font-family:arial,sans-serif;color:#000" width=3D"15%" nowr
 ign=3D"top"><font style=3D"font-weight:bold;font-size:10pt;font-famil
 s-serif;color:#000">Sale price:</td><td style=3D"font-size:10p
 mily:arial,sans-serif;color:#000" valign=3D"top"><font style=3D"font-
 ;font-size:10pt;font-family:arial,sans-serif;color:#000">\$181.50</fon
 </tr><tr><td style=3D"font-size:10pt;font-family:arial,sans-serif;col
 width=3D"15%" nowrap=3D"" valign=3D"top">Quantity sold:</td><td style
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Cut
 off

EXHIBIT # 52

nowrap=3D"" valign=3D"top">Sale date:</td><td style=3D"font-size:10pt
arial,sans-serif;color:#000" valign=3D"top">Dec-01-12 18:54:01 PST</t
r><td style=3D"font-size:10pt;font-family:arial,sans-serif;color:#000
15%" nowrap=3D"" valign=3D"top">Buyer:</td><td style=3D"font-size:10p
:arial,sans-serif;color:#000" valign=3D"top">nina correia</td></tr><t
le=3D"font-size:10pt;font-family:arial,sans-serif;color:#000" width=3
ap=3D"" valign=3D"top"></td><td style=3D"font-size:10pt;font-family:a
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or:#000" valign=3D"top" class=3D"_m_3729392004584666707noWrap"><font s
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:ninascorreia@aol.com" target=3D"_blank">ninascorreia@aol.com/<a>) [<
ttp://contact.ebay.com/ws/eBayISAPI.dll?ReturnUserEmail&requested
ck&redirect=3D0&iid=3D330833102936" target=3D"_blank">contact
font></td></tr></tbody></table></div></td></tr><tr><td style=3D"font-
;font-family:arial,sans-serif;color:#000" width=3D"15%" nowrap=3D"" v
>Buyer's shipping address:</td><td style=3D"font-size:10pt;font-famil
ans-serif;color:#000" valign=3D"top"><div><table border=3D"0" cellpad
llspacing=3D"0"><tbody><tr><td style=3D"font-size:10pt;font-family:ar
rif;color:#000" valign=3D"top" class=3D"_m_3729392004584666707noWrap"
ina correia</td></tr><tr><td style=3D"font-size:10pt;font-family:aria
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4215 prairie flower ct</td></tr><tr><td style=3D"font-size:10pt;font-t
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nowrap=3D"">reno, NV 89511-6710 United States</td></tr></tbody></tabl
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1/7?euid=3D45d0df16f2ea40759d3656f834970b06&loc=3Dhttp%3A%2F%2Fcg
%2Fws%2FeBayISAPI.dll%3FSellHub%26ssPageName%3DADME%3AL%3AE0ISSA%3AU
1" target=3D"_blank">Sell another Item | <a href=3D"http://rover.
ver/0/e12011.m43.l1156/7?euid=3D45d0df16f2ea40759d3656f834970b06&
3A%2F%2Fpayments.ebay.com%2Fws%2FeBayISAPI.dll%3FUnifiedCheckoutSelle
Details%26itemId%3D330833102936%26transId%3D0%26buyerid%3D0%26ssPageN
DME%3AL%3AE0ISSA%3AUS%3A1156" target=3D"_blank">Send invoice to buyer
</td></tr></tbody></table></td></tr></tbody></table></div></td><td
"top" width=3D"185"><div><span style=3D"font-weight:bold;font-size:10
ily:arial,sans-serif;color:#000">Provide shipping information
><table border=3D"0" cellpadding=3D"0" cellspacing=3D"0" widt
dy><tr><td><img src=3D"http://q.ebaystatic.com/aw/pics/s.gif" height=
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44.l1121/7?euid=3D45d0df16f2ea40759d3656f834970b06&loc=3Dhttp%3A%
y.com%2Fws%2FeBayISAPI.dll%3FMyeBay%26CurrentPage%3DMyeBaySold%26ssPa
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.m44.l1121/7?euid=3D45d0df16f2ea40759d3656f834970b06&loc=3Dhttp%3
bay.com%2Fws%2FeBayISAPI.dll%3FMyeBay%26CurrentPage%3DMyeBaySold%26ss
e%3DADME%3AL%3AE0ISSA%3AUS%3A1121" target=3D"_blank"><img src=3D"http

Exhibit B17 #52

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off

--B 3739174330 4019078869--

EAI000079

8
EXHIBIT
#52



Exhibit #1

I am requesting the full Raw Message for the recently produced for the December 1, 2012 eBay sales receipt for the 1972 Original Oil Painting Man With Red Umbrella sold by your client Norb Novocin.

Kindly produce this raw message of this email as soon as possible.

Submitted by
Annamarie Trombetta

From: Anderson Duff <ajd@hoganduff.com>
Sent: Wednesday, November 16, 2022 1:08 PM
To: Annamarie Trombetta <annamarietrombettalegal@outlook.com>
Cc: Adam Bialek <adam.bialek@wilsonelser.com>; Farmer, Jana S. <Jana.Farmer@wilsonelser.com>; Haimson, Nicole <Nicole.Haimson@wilsonelser.com>
Subject: Re: Norb Novocin Deposition Full Production of Exhibit #4 -2 Page eBay email

Dear Ms. Trombetta:

Please find a version of the email previously produced as EAI000058-EAI000059 attached. As previously discussed, my clients are producing this email again solely because a small portion of the email was cutoff when it was converted to a .pdf. To avoid confusion, I have stamped the email as EAI000060 rather than reproducing it with the same bates number. Since you have taken the position in several filings that I fabricated evidence because the @ symbol did not appear in an email my clients produced, I made sure that the @ symbols were preserved when converting this email to a .pdf for production.

With respect to your request for "ALL eBay emails to the buyer Nina Correria's proof of payment and all eBay emails from Nina Correria to Norb Novocin and Estate Auctions Inc.," my clients cannot produce documents that do not exist. We have discussed this issue *many* times.

Best,

-Anderson-
646.450.3607
HoganDuff.com

From: Annamarie Trombetta <annamarietrombettalegal@outlook.com>
Date: Wednesday, November 16, 2022 at 8:59 AM
To: "Anderson J. Duff" <ajd@hoganduff.com>, Adam Bialek

Re: Email

Exhibit #2

Annamarie Trombetta <annamarietrombettalegal@outlook.com>

Fri 11/18/2022 2:39 PM

To: Anderson Duff <ajd@hoganduff.com>; Adam Bialek <adam.bialek@wilsonelser.com>; Farmer, Jana S. <Jana.Farmer@wilsonelser.com>; Haimson, Nicole <Nicole.Haimson@wilsonelser.com>

To All Parties,

On October 28, 2022 Plaintiff called for a Meet and Confer to conclude Discovery. Plaintiff notes to all parties that I addressed the incomplete eBay receipt for the 1972 Original Oil Painting Man With Red Umbrella to Mr. Duff. All the WorthPoint's attorneys were in attendance did not state that the Novocin eBay receipt was produced on the 28th. Aside from this none of the attorneys, particularly Mr. Bialek at any time and day --the 28th of October confirmed any production of the Novocin eBay receipt had been produced to Mr. Duff or Plaintiff.

Please Note that On October 29, 2022 Plaintiff sent to all the attorneys, pages 74 to 79 of the September 21, 2022 Deposition by Mr. Novocin who claims he keeps all his eBay emails. None of the attorneys sent me the Novocin eBay receipt dated Dec. 1, 2012.

In fact on October 31, 2022 Mr. Duff confirmed he would send me a complete copy of 1972 Original Oil Painting Man With Red Umbrella from his client when it became available.

There seems to be so many contradictions to your claim Mr. Bialek. Can you explain why --if the eBay receipt was produced on the 21st of September why you did not email the eBay receipt to Plaintiff before yesterday, November 17, 2022.

Submitted Nov. 18, 2022
Annamarie Trombetta

From: Anderson Duff <ajd@hoganduff.com>

Sent: Thursday, November 17, 2022 1:36 PM

To: Bialek, Adam <Adam.Bialek@wilsonelser.com>; Annamarie Trombetta <annamarietrombettalegal@outlook.com>; Annamarie Trombetta <atrombettaart@gmail.com>; ajd@andersonjduff.com <ajd@andersonjduff.com>

Cc: Farmer, Jana S. <Jana.Farmer@wilsonelser.com>; Haimson, Nicole

Exhibit #3

Re: Norb Novocin Deposition Full Production of Exhibit #4 -2
Page eBay email

Anderson Duff <ajd@hoganduff.com>

Fri 11/18/2022 6:47 PM

To: Annamarie Trombetta <annamarietrombettalegal@outlook.com>

Cc: Adam Bialek <adam.bialek@wilsonelser.com>; Farmer, Jana S.

<Jana.Farmer@wilsonelser.com>; Haimson, Nicole <Nicole.Haimson@wilsonelser.com>

Please keep in mind that my clients will be seeking an award of attorneys' fees from you. Every redundant, nonsensical demand you make of me will contribute to that cost. At present, we believe you will be paying in excess of \$50k for my fees alone at the conclusion of this matter.

Best,

-Anderson-
646.450.3607

From: Anderson Duff <ajd@hoganduff.com>

Sent: Friday, November 18, 2022 6:42:16 PM

To: Annamarie Trombetta <annamarietrombettalegal@outlook.com>

Cc: Adam Bialek <adam.bialek@wilsonelser.com>; Farmer, Jana S.

<Jana.Farmer@wilsonelser.com>; Haimson, Nicole <Nicole.Haimson@wilsonelser.com>

Subject: Re: Norb Novocin Deposition Full Production of Exhibit #4 -2 Page eBay email

Ms. Trombetta:

Please confirm receipt of this email before 10:00 pm ET tonight.

Best,

-Anderson-
646.450.3607

From: Anderson Duff <ajd@hoganduff.com>

Sent: Friday, November 18, 2022 6:40:17 PM

To: Annamarie Trombetta <annamarietrombettalegal@outlook.com>

Cc: Adam Bialek <adam.bialek@wilsonelser.com>; Farmer, Jana S.

<Jana.Farmer@wilsonelser.com>; Haimson, Nicole <Nicole.Haimson@wilsonelser.com>

Subject: Re: Norb Novocin Deposition Full Production of Exhibit #4 -2 Page eBay email

Exhibit
#4

Adam sent this email to you as an attachment.

Best,

-Anderson-
646.450.3607

From: Annamarie Trombetta <annamarietrombettalegal@outlook.com>
Sent: Friday, November 18, 2022 2:20:20 PM
To: Anderson Duff <ajd@hoganduff.com>
Cc: Adam Bialek <adam.bialek@wilsonelser.com>; Farmer, Jana S.
<Jana.Farmer@wilsonelser.com>; Haimson, Nicole <Nicole.Haimson@wilsonelser.com>
Subject: Re: Norb Novocin Deposition Full Production of Exhibit #4 -2 Page eBay email

Mr. Duff,

On November 17, 2022 --yesterday---I sent you an example of a "raw Message" for an eBay notice dated July 16, 2022. Kindly open it and review it and you will see what it is I am requesting. Every email server has some kind of Original message. If it was an gmail account you have to go to MORE and click on Original and you will find the text and codes for the message.

Submitted by
Annamarie Trombetta

From: Annamarie Trombetta <annamarietrombettalegal@outlook.com>
Sent: Thursday, November 17, 2022 9:14 AM
To: Anderson Duff <ajd@hoganduff.com>
Cc: Adam Bialek <adam.bialek@wilsonelser.com>; Farmer, Jana S.
<Jana.Farmer@wilsonelser.com>; Haimson, Nicole <Nicole.Haimson@wilsonelser.com>
Subject: Re: Norb Novocin Deposition Full Production of Exhibit #4 -2 Page eBay email

Mr. Duff,

Attached are two eBay Raw Message for my emails from ebay.

Exhibit #5

Re: Artist Annamarie Trombetta----Fraudulent Artwork--and links to Fraudulent Artwork

From: WorthPoint Customer Support (support@worthpoint.desk-mail.com)

To: trombettaart@yahoo.com

Date: Saturday, February 20, 2016, 10:25 AM EST

Ticket #57565: Artist Annamarie Trombetta----Fraudulent Artwork--and links to Fraudulent Artwork

WorthPoint | Feb 20, 2016 10:24AM EST

Thank you for submitting your request. We have received your request and are working on responding to you as soon as possible. If you have any additional information to add to this case, please reply to this email.

Thanks in advance for your patience and support.

This message was sent to trombettaart@yahoo.com in reference to Case #57565.

X-Apparently-To: trombettaart@yahoo.com; Sat, 20 Feb 2016 15:25:20 +0000
Return-Path: <pm_bounces@pm.mtasv.net>
Received-SPF: pass (domain of pm.mtasv.net designates 50.31.156.122 as permitted sender)
X-YMailISG: q3T3oJUWLDt6HAGZ4vF9MuDap7cZAJOFfxIEVmwHeXTUrRlZ
hIIY15AJzD5FW_abQkTueXEhAWMggoRvWhhyvW3bIsdNevwKpaFm0SHv8Wsm
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X-Originating-IP: [50.31.156.122]
Authentication-Results: mta1486.mail.gql.yahoo.com from=worthpoint.desk-mail.com; domainkeys=neutral (no sig); from=pm.mtasv.net; dkim=pass (ok)
Received: from 127.0.0.1 (EHL0 sc-ord-mta122.mtasv.net) (50.31.156.122)
by mta1486.mail.gql.yahoo.com with SMTPS; Sat, 20 Feb 2016 15:25:20 +0000
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h=From:Date:Subject:MIME-Version:Content-Type:To:Reply-To:In-Reply-To:Message-ID;
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y960NMB15ZFSy7xkO90=
Received: by sc-ord-mta122.mtasv.net id hp22m01jk5k9 for <trombettaart@yahoo.com>; Sat, 20 Feb 2016 10:25:19 -0500 (envelope-from <pm_bounces@pm.mtasv.net>)
X-IADB-IP: 50.31.156.122
X-IADB-IP-REVERSE: 122.156.31.50
From: "WorthPoint Customer Support" <support@worthpoint.desk-mail.com>
Date: Sat, 20 Feb 2016 10:25:19 -0500
Subject: Re: Artist Annamarie Trombetta----Fraudulent Artwork--and links
to Fraudulent Artwork
MIME-Version: 1.0
Content-Type: multipart/alternative;
boundary=" _aspNetEmail= _92c89c994f084ec389ee2ea30cad4ab2"
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X-Complaints-To: abuse@postmarkapp.com
X-PM-RCPT: |bTB8MjA4ODZ8Mjc0OTQxfHRYb21iZXR0YWYfyDEB5YWhvby5jb20=|
X-PM-Message-Id: 94df665e-e9cd-4d7e-b47d-9cf381e58918
To: trombettaart@yahoo.com
Reply-To: support@worthpoint.desk-mail.com
In-Reply-To: <1789304145.217902.1455981861074.JavaMail.yahoo@mail.yahoo.com>
X-Mailer: Desk.com Support Platform
Message-ID: <56c8854428220_fa05de53281518fa@worthpoint.desk.com>
Content-Length: 3235

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charset="UTF-8"
Content-Transfer-Encoding: quoted-printable

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E to reply=0D=0A=0D=0A-----=
-----=0D=0A=0D=0ARe: =
Artist Annamarie Trombetta----Fraudulent Artwork--and links to Fraudulent=
Artwork=0D=0A=0D=0AWorthPoint =7C Feb 20, 2016 10:24AM EST=0D=0A=0D=0ATh=
ank you for submitting your request=2E We have received your request and=
are working on responding to you as soon as possible=2E If you have any=
additional information to add to this case, please reply to this email=2E=
=0D=0A=0D=0AThanks in advance for your patience and support=2E=0D=0A=0D=0A=
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ttaart=40yahoo=2Ecom in reference to Case =2357565=2E=0D=0A-----=
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=0A<h2 style=3D=22text-align:center; color:white; background-color:steelb=
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--and links to Fraudulent Artwork</h2>=0D=0A=0D=0AWorthPoint</str=
ong> =26nbsp;=7C=26nbsp; Feb 20, 201=
6 10:24AM EST=0D=0A
=0D=0A=0D=0AThank you for submitting your=
request=2E We have received your request and are working on responding =
to you as soon as possible=2E If you have any additional information to =
add to this case, please reply to this email=2E

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anks in advance for your patience and support=2E=0D=0A=0D=0A<div style=3D=
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yahoo=2Ecom in reference to Case =2357565=2E=0D=0A=0D=0A</div>=0D=0A</div=
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